UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CHARLENE JAMES, Individually and on behalf of all other persons similarly situated

Plaintiffs,

08 Civ. 1457 (RWS)(KNF)

-against-

DEFENDANTS' DISCLOSURE PURSUANT TO RULE 7.1 OF THE FEDERAL RULES OF CIVIL PROCEDURE

T&H SECURITY, INC., CITADEL SPECIAL : EVENTS SERVICES, INC., THOMAS FERRARA, : REIDA FERRARA, TYRONE A. YORIS, and JOHN : DOES #1-10, Jointly and Severally.

Defendants.

: X

PURSUANT TO RULE 7.1 OF THE FEDERAL RULES OF CIVIL PROCEDURE, the

undersigned counsel of record for Defendants T&H Security, Inc., Citadel Special Events Services, Inc., Thomas Ferrara, Rita Ferrara, and Tyrone A. Yorio certify that Defendants T&H Security, Inc. and Citadel Special Events Services, Inc. do not have any outstanding securities in the hands of the public, and that there is no parent company that has outstanding securities in the hands of the public.

Dated:

April 9, 2008

New York, New York

Respectfully Submitted

ARENT FOX

Darrell S/Gay (DSG/603/)

Sonya D. Johnson (SDJ/9509) 1675 Broadway – 34th Floor

New York, New York 10019

212-484-3900

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this date I caused a copy of the foregoing Defendants' Answer & Affirmative Defenses and Defendants' Rule 7.1 Statement to be served on plaintiffs by hand to plaintiffs' counsel, William C. Rand, Esq. 711 Third Avenue, Suite 1505, New York, NY 10017 and Jeffrey M. Gottlieb, Esq., Berger & Gottlieb, 150 East 18th Street, Suite PHR, New York, New York 10003.

Dated: April 9, 2008

New York, New York

Sonya D Johnson

Arent Fox LLP

1675 Broadway

New York, NY 10019-5820